

HON. SYLVIA HINDS-RADIX Corporation Counsel

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, N.Y. 10007 ZACHARY KALMBACH

Assistant Corporation Counsel phone: (212) 356-2322 fax: (212) 356-3509 zkalmbac@law.nyc.gov

May 27, 2022

VIA ECF

District Judge Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street New York, New York, 10007

Re: Carol Lopez v. City of New York, et al.,

20 Civ. 2502 (LJL)

Your Honor:

I represent defendants City of New York, Anthony Saline, Crystal Dones, William Gonzalez, and Steven Torres in the above-referenced matter. Defendants write in response to the Court's Order dated May 27, 2022, to respectfully submit copies of the unpublished cases cited in their memorandum of law (ECF No. 65) and reply memorandum of law (ECF No. 71) in support of their motion to dismiss plaintiff's Monell claim. Defendants sincerely apologize for failing to timely file this submission. Enclosed please find, in alphabetical order, copies of the unpublished cases cited by defendants.

Thank you for your time and consideration.

Respectfully submitted,

/s/ Zachary Kalmbach

Zachary Kalmbach
Assistant Corporation Counsel
Special Federal Litigation Division

Encls.

cc: Via ECF

J. Remy Green, Esq. Jessica Massimi, Esq. Cohen & Green, P.L.L.C. Attorneys for plaintiff